

DAVID J. GRECH
DGRECH@GRSM.COM

USDC SDNY
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28TH FLOOR
NEW YORK, NY 10004
PHONE: (212) 269-5500
FAX: (212) 269-5505
WWW.GRSM.COM

January 12, 2023

VIA ECF

The Honorable Analisa Torres, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *De La Rosa v. Seveneast 19 LLC and Scanlan Theodore Americas, LLC*
Case No. 1:22-cv-06575-AT-BCM

Dear Judge Torres:

Earlier today, our firm filed our notice of appearance as attorneys of record for defendant Scanlan Theodore Americas, LLC in this case. In that respect, we will be substituting for Milber, Makris, Plousadis & Seiden, LLP. We write, pursuant to Rule I(C) of Your Honor's Individual Practices in Civil Cases and with Plaintiff's counsel's consent, to respectfully request an extension of time for Scanlan Theodore to answer, move, or otherwise respond to the complaint and an extension of time for the parties to submit their joint letter and jointly proposed Case Management Plan and Scheduling Order.

The parties' joint letter and jointly proposed Case Management Plan and Scheduling Order are currently due January 13, 2023, and Scanlan Theodore's response to the complaint is currently due January 23, 2023. The reason for this request is that our office needs time to investigate the allegations in the complaint concerning purported accessibility barriers at the premises at issue. Moreover, Scanlan Theodore is the tenant of the premises. The landlord, co-defendant Seveneast 19 LLC, has yet to appear in this case, and the input of that party would be necessary for the parties' joint letter and jointly proposed Case Management Plan and Scheduling Order.

We respectfully request an extension of thirty (30) days to February 22, 2023 for Scanlan Theodore to respond to the complaint and an attendant extension to March 8, 2023 for the parties to submit their joint letter and jointly proposed Case Management Plan and Scheduling Order. This represents Scanlan Theodore's second request for an extension of its time to respond to the complaint. The prior request, by Milber, Makris, Plousadis & Seiden, LLP, was also made with Plaintiff's counsel's consent and was granted. The requested extensions will not affect any other scheduled date.

Hon. Analisa Torres, U.S.D.J.
U.S. District Court, S.D.N.Y.
January 12, 2023
Page 2 of 2

We appreciate the Court's attention to this matter and are available at the Court's convenience should it have any questions.

Respectfully Submitted,

GORDON REES
SCULLY MANSUKHANI, LLP

/s/ David J. Grech

David J. Grech

GRANTED.

SO ORDERED.

Dated: January 13, 2023
New York, New York



ANALISA TORRES
United States District Judge